

Sent by email to: Local.plan@basingstoke.gov.uk

04/03/2024

Dear Sir/ Madam

Basingstoke and Deane Local Plan Update

1. Thank you for consulting the Home Builders Federation (HBF) on the Basingstoke Local Plan Update. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Plan period.

2. The proposed a plan period is 2021 to 2040 which will require the plan to be adopted by the end of 2025 to ensure that the plan looks forward for a minimum of 15 years as required by paragraph 22 of the NPPF. Given that the Council expect the expect to consult on a draft plan at the end of 2024 and the beginning of 2025 it would seem highly unlikely that the plan will be submitted, examined, and adopted in less than 12 months. The HBF would therefore recommend that the plan is extended by at least a year to ensure it is consistent with national policy. However, the council may wish to extend this further should it not expect to meet the deadlines set out in the LDS.

Policy CLC1: A Carbon Neutral, Climate Adapted Borough

3. The proposed policy is not a policy as it just signposts to other policies and does not provide any specific direction to decision maker or applicant. Rather than include this as a policy we would suggest it would be more appropriate to set this as an objective in the supporting text.

Policy SPS1: Scale and distribution of Development.

Housing requirement

4. This policy states that over the plan period the council will deliver at least 16,180 new homes. Delivery will be phased using a stepped trajectory that includes 880 dwellings per annum in 2021/22, 850 dpa between 2022/23 to 2025/26 reducing to 660 dpa between 2026/27 to 2030/31 and then increasing to 955 dpa for the remainder of the plan period.
5. With regard to the housing requirement, it will be important for the council to consider whether housing needs will be higher than arrived at using the standard method. The NPPF states that the NPPF is a starting point with paragraph 2a-010 of Planning Practice Guidance (PPG) setting out a range of circumstances where housing needs may be higher than that arrived at using the standard method. It will therefore be important for the Council to consider these circumstances carefully and where necessary respond to these by increasing the number of homes being delivered in this local plan. Given past rates of delivery have far exceeded those being proposed for this local plan it is clear higher levels of growth can be sustained and there is a strong demand for housing in the area that should not be quashed by this local plan.
6. The HBF do not consider the use of the stepped trajectory to be sound. The justification for the stepped trajectory is set out in paragraphs 4.13, 4.14 and 4.15. The first reason put forward by the council is that significant proportion of new sites to be delivered are on large strategic sites with almost two-thirds and new homes coming forward on the sites at Southern Manydown and Popham. The HBF does not object to local plans that includes large sites, but the council must recognise that a decision to include such sites will inevitably push delivery back and as such seek to offset this through the allocation of smaller sites that will come forward more quickly and ensure housing is delivered more consistently across the plan period. The position taken by the Council, in our opinion, unnecessarily delays the meeting of identified development needs which is inconsistent with paragraph 68-021 of Planning Practice Guidance (PPG).
7. The second reason given by the council is that the council has its own ambitious home building programme that it is currently considering option as to how this can be set up. It is completely inappropriate to seek to delay the delivery of housing in the early years of the plan in order to support the council's own house building programme. If the council seeks

to act as a developer in cannot act in manner that then seeks to prioritise its own sites to the exclusion of others that could be allocated that would come forward earlier in the plan period.

8. The final reason given is that it will give the Council time to work with major infrastructure providers to get more certainty about future investment and allow infrastructure to catch up with past growth. However, latest infrastructure delivery plan does not suggest that the delivery of the proposed new hospital at Manydown or secondary school provision is critical and as such a show stopper preventing growth in the early years of this plan. Whilst new infrastructure such as the proposed hospital are a clear benefit for the borough and indeed for the wider area it supports it is not a justification for using a stepped trajectory and delaying the provision of much needed housing.
9. Given that the country as a whole, and the south east region in particular, facing a housing crisis it is essential that the delivery of homes is not pushed back until the end of the plan period as is being proposed in this local plan.

Unmet needs of other areas

10. The Council state that they have not been approached by other authorities with regard to their unmet needs. Whilst this may be the case it does not mean that no unmet needs exist in neighbouring areas. We are aware that the Partnership for South Hampshire has set out in their latest position statement that some authorities in that there are authorities in that sub region which will not meet housing needs and that Reading will not be able to meet their needs in full should the adopt the standard method. Some of these unmet needs will relate to the urban uplift and whilst these should be met in the urban areas themselves the Council must, before dismissing these needs, at least examine whether there is capacity and consider the benefits of delivering some of the growth ear marked for these areas in Basingstoke and Deane.

Housing supply

11. In addition to completion, outstanding planning permissions, existing allocations, and windfall of 11,530 homes, as set out in figure 4.1 the Council have identified sites to deliver a further 6,484 homes over the plan period. This is a total of 18,105 homes and gives a buffer of just over 11%. Whilst the HBF welcomes the buffer, and agree with the council that

this is necessary, we would question whether this is sufficient given the focus of the Council on strategic sites which inevitably come with a greater risk of delay due to the complexity and difficulty in delivering such sites.

12. The total supply over the plan period should also be clearly set out in this policy and the trajectory in figure 4.2. As part of the evidence the HBF would also recommend that the Council include a trajectory set out in a single table for each of the sites that make up total supply over the plan period. This provides a single point of reference with regard to supply expectations and allows for the effective scrutiny of supply and with the assumptions made with regard to sites are justified. Without this evidence supporting this local plan it has not been possible to comment on whether the Council's assumptions in relation to the new allocations are sound.

10% of requirement to be delivered on small sites.

13. The Council need to ensure that at least 10% of the housing requirement on small sites of no more than one hectare in line with paragraph 70 of the NPPF. In meeting this requirement the Council will have to ensure that these are identified as an allocation in the local plan or in the Brownfield Register and does not include small site windfalls as contributing to the 10% requirement. Whilst it will be important to promote more small sites to come forward over the plan period as windfall, as mentioned in part d of paragraph 70 of the NPPF, the HBF considers this to be distinct from the 10% requirement set out in part a of paragraph 70 of the NPPF. Further clarification that the 10% should not include windfall development is in the glossary where windfall is defined as "Sites not specifically identified in the development plan".
14. It is important to recognise that the allocation of small sites is a priority for the Government and stems from the Government's desire to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.
15. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity

of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up there residential activities in the next three years. Whilst this decline is due to a range of factors more allocations of small sites would ease the burden on many SME developers and provide more certainty that there scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

16. With regard to supporting more small windfall sites as required by paragraph 70(d) of the NPPF the Council should look to include a specific policy to support such development. Such a policy should recognise the importance of small sites and SME house builders emphasise the Council's willingness to be flexible on small sites that often face more challenging viability (especially where these are being brough forward on previously developed land) and the fact that small scale delivery of affordable homes on smaller sites is sometimes not attractive to many Housing Associations. To take this into account and encourage more small sites this policy, or indeed a specific small sites policy, could include the following:

"A flexible approach will be encouraged to the delivery of Affordable Housing on small sites assessed on a site-by-site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on-site provision or another form of recognised Affordable Product as defined in the NPPF."

ENV4: Nutrient Neutrality

17. This policy sets out that new development resulting in an increase in population served by waste water system discharging in the River Test and Itchen catchment are required demonstrate nutrient neutrality. Whilst the HBF recognises the need for such policies in order to overcome the advice given by Natural England's we contend that the significance

of the harm created by new home is minimal and that the Council as the competent authority is able to set aside this advice.

18. Research commissioned by the HBF¹ shows that the occupancy of new homes accounts for just 0.29% of total nitrogen emissions each year. The research also puts nutrient output from residential properties in the context of agricultural activities which is responsible for around 70% of the nitrogen that finds its ways into rivers and streams. The research found that each dairy cow in affected areas produces Nitrogen discharges equivalent to 29 homes while each sheep is responsible for the same amount of Nitrogen as three family homes. The report shows that agriculture accounts for 70% of the nitrogen released into our rivers, with the existing housing/population contributing 30% through discharges into the sewerage system with new housing would contribute 0.29% of this figure.

19. Housing makes such a negligible contribution to the pollution in our rivers we would question whether new housing is having a significant effect on the relevant protected habitats especially when compared to the impact farming practices clearly have with regard to the declining quality of our rivers. However, if the policy is to be retained, the HBF disagrees the Council's use of a 2.4 people as the average household size in new homes within the nutrient budget calculator. Other areas, for example the affected LPAs in Norfolk, have undertaken research that shows the net additional population new household is much smaller than the 2.4 average used by the Council. This is because not all new homes are occupied by people moving to the area. Some will already be living in the area and are purely creating new households not new residents in the area. Research commissioned by the HBF² from Lichfield's shows that the net additional average household size in the Test and Itchen Catchment Area is just 1.67. This is significantly lower and should be used in the calculator and referenced in the local plan to confirm it as the level of additional growth per household adopted by the Council.

ENV6: Biodiversity, Geodiversity and Nature Conservation

20. Part 5a of the policy sets out the requirement for development to achieve the statutory requirement of delivering a 10% net gain in biodiversity. In addition, part 5a sets out a hierarchy prioritising net gains on site or where not possible for offsite gains to be within the borough on the applicants own land or on land that support strategic nature recovery

¹ <https://www.hbf.co.uk/news/nutrient-pollution-review/>

² <https://www.hbf.co.uk/news/nutrient-neutrality-lichfields-report-unblocking-homebuilding/>

initiatives. Whilst this may be a preference for the council it just be recognised that in some circumstances off site delivery outside the borough will be necessary where there is insufficient capacity to support gains in the borough and that this is a perfectly acceptable approach to delivering this statutory requirement.

21. The Council does not appear to be aware that developers are already encouraged to deliver as much gain on site or in the borough through the metric which increases the net gain required where deliver offsite is outside of Borough and as such will increase the cost of delivering net gains. The HBF would therefore question whether it is necessary for the Council to state a preference within policy as to where gains should be delivered. However, is a preference is stated it must be recognised that:

- delivery of BNG in the relevant National Character Area (NCA) is considered within the metric the equivalent of delivering net gains locally. As such delivering offsite in the NCA but outside of the Borough should be recognised in the policy and given equal weight to local delivery.
- That offsite delivery outside of the Borough or NCA is acceptable if no capacity locally.
- That as a final resort development will be able to use national credits.

22. Finally, part 6 reads more like guidance to the applicant as to where improvement could be made in order to achieve net gains and would be more appropriate in the supporting text or supplementary guidance.

ENV11: Energy standards

23. Parts 1 and Part 2 of this policy would require all new development to be net zero through a combination of removing fossil fuel energy use on site, setting energy use standards for all new dwellings of 35kwh/m²/year and space heating demand of less than 15kwh/m²/year, requiring the generation of renewable energy to meet energy demand and use offsetting where for any residual energy demand that cannot be met through onsite renewable energy. To demonstrate performance against these standards the council would require an assured performance method that avoids a performance gap and accurately calculate the space heating demand energy use intensity of each building using a modelling methodology such as Passivhaus or CIBSE TM54.

24. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the county in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
25. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and give consideration as to how the requirements of the proposed amendments to CE2 are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. In this statement the housing minister notes that “*Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes*” and that local standards can “*add further costs to building new homes by adding complexity and undermining economies of scale*”. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:
- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
 - The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
26. Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy and policy H5 are fully and robustly tested. Whilst the Council have undertaken some cost analysis in their net zero carbon study the Council are still to test the cumulative impact of these and the other policies in the local plan. This evidence would suggest that the cost of meeting these for a semi-detached house for example would be in the region of 5%. This is lower than some of the costs for similar standards set out in work by the Future Homes Hub (FHH) to support and inform the implementation of the Future Homes Standard, the findings of which are set out in “Ready for Zero”. This study tests a number of archetypes

against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.

27. The various specifications and costs considered are summarised in Figure 8 of this report and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around a 15% to 20% increase in per unit costs compared to the 2021 Building Regulations. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council there is a significant difference, and it will be necessary for the Council to provide more detailed evidence on costs.

28. Whilst we would not disagree with the Council' evidence which suggests that the proposed standards are technically feasible the HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed in CC2 are higher than those proposed by Government in the Future Homes Standard, which is expected to be introduced in 2025, they will likely require higher levels of fabric efficiency which will require new skills and materials that may not be readily available, and which could slow delivery the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements would be needed to steadily build up the skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would “... *create a high risk of quality problems, inflated costs and, potentially, stalled build programmes.*” As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed.

29. Moving to the second bullet point, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed by the Council and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate.

30. The Council also propose to require developers to use methodologies for assessing the energy performance of new homes against this policy other than SAP. The HBF consider this approach to be inconsistent with the WMS which requires policies, and by extension the assessment of performance against those policies to be based on SAP. This provides consistency in the assessment frameworks for both planning policies and building regulations and ensures there is not a proliferation of assessment frameworks used that adds to the complexity for both applicant and decision maker. This clarification of national policy should be reflected in the requirements to be included in the Energy Statement.
31. Part 3 of ENV11 requires residential development of 100 homes or more to calculate embodied carbon emissions and demonstrate actions being taken to reduce these. Whilst the HBF recognises that there is a need to reduce embodied carbon in development it is not evident how a decision maker would determine what a reasonable baseline is with regard to embodied or how much reduction is required. Would this level of embodied carbon then be conditioned and if certain materials are no longer and have to be sourced from elsewhere, increasing the embodied carbon compared to original estimates, would this then require an application to be made to amend the condition. Seeking to maintain a specific level of embodied carbon from the estimates made in a planning permission could be impossible without significantly delaying the delivery of new homes. Therefore, the HBF consider part 3 of the policy to be ineffective and should be deleted or amended to state that developments of 100 or more homes should demonstrate the actions they have taken to reduce embodied carbon.

INF2: Transport

32. Part k) of the policy states that development proposal that “*Support changing transport technology and usage*” will be permitted. This lacks the necessary clarity to be a helpful to the applicant or decision maker. It is assumed this is in reference to electric vehicles, but it could be much wider without understanding or specifying what those changes may be. Given that it is impossible to know what changes may come and whether these will be appropriate solutions we would suggest this element of the policy lacks the necessary clarity or justification to be included in the policy.
33. Part o) could be interpreted as all development will need to provide safe and secure connections to facilities. It will be the case that some development will be located where

safe and secure connections already there and as such there is no planning reason for requiring them. We would suggest the policy is amended to start with “*Where necessary ...*”

34. Part s) states that waste a recycling storage area should be provided in accordance with the SPD. The Council should not give the weight of a local plan policy to and SPD and suggest that this sub section is amended to read have regard to the Design and Sustainability SPD.

HSG2: Affordable Housing

35. This policy requires 40% of homes on sites of 10 or more units or an area 0.5 ha or more to be built as affordable housing and on all sites developing net new dwellings in the North Wessex Downs Landscape. With regard to the second requirement this is unsound as it is inconsistent with paragraph 65 which sets a threshold of 5 or more units in rural areas. The threshold in this area should be set at 5 units.
36. With regard to the level of affordable housing required by this policy it is not possible to comment on its soundness as the Council do not appear to have published a viability assessment. However, it will be important reflect the full impact of the policies in this local plan. In particular the council will need to ensure that there is comprehensive sensitivity testing given that the actual costs of delivering policies such as BNG, nutrient neutrality and improved energy efficiency standard are often based on broad estimates within Government Impact Assessments. Without sensitivity testing there is a high risk of the Council planning at the margin of viability requiring viability negotiation on a case by case basis.
37. Turning to flexibility within this policy, and indeed the plan in general, the Council must include in policy that where the costs placed on development by this local plan do make development unviable that the council is be open and willing to amend policy requirements in order to ensure development comes forward. This is mentioned in paragraph 10.27 but it should be in the policy itself to provide decisions makers and applicants with the clarity that this is the council’s intention.

HSG6: Specialist Accommodation for Older People and those with Specialised Needs

38. The HBF would considers such an approach to be ineffective in meeting the specialist accommodation needs for older people across Basingstoke. The most effective approach

to meeting the housing needs of older people is for the Council to allocate sites within the local plan for retirement housing and other specialist accommodation for older people. Given the competition for sustainably located sites will be high, allocation is the most effective way in ensuring such development will come forward over the plan period.

39. Finally, the Council have suggested that specialist accommodation for older people will be required to provide affordable housing in line with policy HSG2. Without a viability assessment it is not possible to say whether this is sound, but the council will need to be aware that the cost of delivering older people's accommodation is higher than for general market housing such as large communal areas, higher marketing costs and longer sales periods. In addition, such development by and large comes forward on previously developed land close to services and as such must pay a premium for development land.

HSG7: Custom and Self build

40. The policy requires 5% of homes expected to be delivered on sites of 100 or more units to be provided as plots for self-build or custom housebuilding. The evidence presented by the Council in the Housing Market Assessment suggests that demand for self-build over the plan period is likely to be around 260 homes. This is based on the growth in the Council's self-build register of 26 individuals being extrapolated over 20 years with a reduction to take account of any needs that will be met from windfall. Firstly, the council will need to ensure that this figure is still robust and reflects the growth in demand for self-build since this evidence was produced 4 years ago.
41. Secondly the Council will need to consider whether the register is robust and that all those on the register are still interested in building their own home. Some may have found plots or no longer have a desire to build their own home. Finally, the Council will need to consider whether those on the register are likely to want a plot on a large development. Many of those looking to build their own home may not want such a plot and as such the Council may need to identify alternative solutions to meeting the demand for self-build plots such as through more permissive approach to small sites the edge of settlements.
42. The PPG also sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing other than policies such as the one being proposed in this local plan. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned

land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

DES4: Internal Space Standards

43. It is proposed that national described space standards will be adopted, however we could find no evidence, as required by NPF and PPG that these are required. If the Council are to adopt these standards, then it will be necessary to provide evidence that they are needed and to take account of these standards in the viability study.

Future engagement

44. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would help. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully



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